

# EXHIBIT 70

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,  
MASSACHUSETTS,  
WASHINGTON, COLORADO,  
CONNECTICUT, DELAWARE,  
DISTRICT OF COLUMBIA,  
HAWAII, ILLINOIS, IOWA, NEW  
MEXICO, NORTH CAROLINA,  
OREGON, PENNSYLVANIA,  
RHODE ISLAND, VERMONT, and  
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States; U.S. DEPARTMENT OF  
HOMELAND SECURITY; ELAINE  
C. DUKE, in her official capacity; U.S.  
CITIZENSHIP AND IMMIGRATION  
SERVICES; U.S. IMMIGRATION  
AND CUSTOMS ENFORCEMENT;  
and the UNITED STATES OF  
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228  
(NGG) (JO)

### **DECLARATION OF I.V.**

I, I.V., hereby declare as follows:

1. My name is I.V. I am 25 years old and currently live in Massachusetts.
2. I have personal knowledge of the matters set forth below.
3. I was born in the Dominican Republic and lived there until I was 8 years old. At that time, my parents, who were already living in the United States, arranged to bring me to the U.S. to live with them. I moved to Lawrence, Massachusetts.
4. I spent the rest of my childhood in Lawrence and attended both private and public schools. In 2014, I graduated with a degree in political science from a public university in Massachusetts.
5. I applied for DACA almost as soon as it was announced in 2012. Receiving DACA was a huge help to me. It allowed me to get a social security card and a driver's license. I was able to buy a car. Even though I had already been paying taxes for years, I was finally able to pay with a social security number, not just my temporary tax ID. I was also able to travel to the Dominican Republic to visit family members who I hadn't seen in over 15 years.
6. Having DACA status allowed me to get a job as a Resident Assistant at my university. After I graduated, I was able to get a job working for a local Massachusetts official doing constituent outreach. I then worked for two years in the office of a private attorney. After that I got a job working in Massachusetts state government, which I still have today. None of this would have been possible without the work permit that DACA made possible.
7. My long-term dream is to attend law school to become an immigration attorney. I want to help other people with immigration needs.

8. If DACA went away, I would lose my work permit, my driver's license, and my ability to support myself. I would certainly lose my current job. Even the prospect of losing DACA is deeply stressful to think about. I have had DACA for five years and have benefited enormously from the program. Losing it now would be a huge loss.
9. DACA is an incredibly important program. Lots of young people have been able to buy houses, start businesses, build wealth, and get good jobs. DACA has helped not just these individuals, but also their families and communities. Taking it away would not just hurt DACA recipients, it would also hurt their families and communities.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5 day of September, 2017.

W

I.V.